

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

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SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION DAYTON

UNITED STATES OF AMERICA, : Case No. 3:23-cr-00099  
 :  
Plaintiff, : Judge Michael J. Newman  
 :  
 : I N D I C T M E N T  
 :  
v. : 18 U.S.C. § 371  
 : 18 U.S.C. § 659  
 :  
1. ALEXANDER WILSON DIAZ-REMACHE :  
 :  
2. JONATHAN EDUARDO REMACHE-DIAZ :  
 :  
3. ALVARO OSWALDO LOAIZA-ALVAREZ :  
 :  
4. GUSTAVO DANIEL VINUEZA-BUENO :  
 :  
Defendants. :

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

I. INTRODUCTION

At all times relevant to this Indictment:

1. United Parcel Service, Inc., ("UPS") and FedEx Corporation ("FedEx") were companies that, among other things, provided interstate shipping delivery and services for other domestic and foreign businesses. For instance, through their respective fleets of airplanes, trucks, and other delivery vehicles, UPS and FedEx moved between the various States goods

and products of other companies.

2. Apple, Inc., ("Apple") was a company headquartered in California that developed and sold various technology products, including Apple Watches, iPhones, iPads, and Mac computers. Apple often sold its products at a series of physical Apple Stores throughout the United States, including Beavercreek, Ohio. Apple often used interstate commercial carriers such as UPS and FedEx to ship its products between the States, including to its store in Beavercreek, Ohio.

3. Signet Jewelers Ltd. ("Signet") was a company headquartered in Ohio that operated a series of jewelry stores throughout the United States, including Maryland, Virginia, and the District of Columbia metropolitan area. Signet often used interstate commercial carriers such as UPS and FedEx to ship its products - such as jewelry and diamonds -- between the States, including to its stores in Maryland and Virginia.

## II. OBJECT OF THE CONSPIRACY

4. Between a beginning date unknown, but at least by in or around January 2023, and in or around September 2023, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** and others known and unknown to the Grand Jury knowingly and intentionally conspired:

a. with intent to convert to their own use, knowingly, intentionally, and unlawfully embezzled, stole, took, carried away, concealed, and by fraud and deception, obtained from any motortruck, trailer, and other vehicle, and from any intermodal container, trailer, and container freight station any goods and chattels of a value exceeding \$1,000 moving as and which were a part of and which constituted an interstate and foreign shipment of freight, express, and other property, in violation of Title 18, United States Code, Section 569 ¶1.

b. knowingly carried and transported in interstate and foreign commerce goods and chattels of a value in excess of \$1,000 that had been embezzled and stolen, knowing the goods to have been embezzled and stolen, in violation of Title 18, United States Code, Section 569 ¶7.

III. MANNER AND MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

5. The objects of the conspiracy were to be accomplished in substance as follows:

a. Defendants **JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** entered the United States on travel visas and, with **ALEXANDER WILSON DIAZ-REMACHE**, established California as a base of operation for their illegal activities. From that location, defendants

**ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** travelled via airplane and vehicles to other states - including, but not limited to, Ohio, Virginia, and Maryland - in search of malls and retail centers housing Apple Stores, jewelry stores, and other businesses.

b. Upon finding a retail center, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** established surveillance there, watching the movements of delivery trucks from UPS, FedEx, and other common carriers at these locations. They did so with the intent of stealing the interstate cargo from these delivery vehicles.

c. After becoming familiar with the delivery patterns at a location, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** intentionally stole and unlawfully took the interstate cargo - including Apple products and jewelry - from the delivery trucks, including vehicles belonging to UPS and FedEx. In stealing these interstate shipments, one or more members of the group often distracted the delivery driver while the others broke into the delivery truck and removed portions of its cargo. One or more

members of the group often served as a lookout for police and private security. To coordinate their theft of these interstate shipments, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** communicated with one another via cellular telephones and Bluetooth technology.

d. After stealing a shipment, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** repackaged the purloined goods and sent them to California via commercial carrier such as UPS and FedEx. Defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** intended for the stolen goods to be resold on the international black market.

e. After saturating an area with thefts of interstate shipments, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO** relocated their efforts to another jurisdiction, frequently moving from state to state to facilitate their illegal activity.

#### IV. OVERT ACTS

6. In furtherance of the conspiracy, and to accomplish



its objects, each of the defendants committed, and caused others to commit, the following overt acts within the Southern District of Ohio, and elsewhere including, but not limited to the following:

a. On or about January 10, 2023, in or around Rockville, Maryland, **ALVARO OSWALDO LOAIZA-ALVAREZ** assisted the theft of approximately \$300,000 in diamonds and other jewelry from a UPS truck making a delivery of an interstate shipment of goods to a subsidiary of Signet.

b. On or about July 30, 2023, **ALVARO OSWALDO LOAIZA-ALVAREZ** traveled from California to Washington, D.C. via airplane.

c. On or about August 1, 2023, in or around Fairfax, Virginia, **JONATHAN EDUARDO REMACHE-DIAZ** assisted the theft of thousands of dollars in diamonds and other jewelry from a UPS truck making a delivery of an interstate shipment of goods to a subsidiary of Signet.

d. On or about August 5, 2023, **JONATHAN EDUARDO REMACHE-DIAZ** used his cellular telephone to photograph jewelry stolen from an interstate shipment of goods unlawfully taken in Fairfax, Virginia on or about August 1, 2023.

e. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO**

**LOAIZA-ALVAREZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** arrived at an Airbnb in Centerville, Ohio.

f. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, **ALVARO OSWALDO LOAIZA-ALVAREZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** traveled to the Greene Town Center, in Beavercreek, Ohio, and begin surveillance near the Apple Store at this location.

g. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** performed surveillance of a FedEx delivery truck that arrived at the Greene Town Center, in Beavercreek, Ohio.

h. On or about September 19, 2023, **ALVARO OSWALDO LOAIZA-ALVAREZ** attempted to distract a FedEx delivery driver in a hallway at the Green Town Center, in Beavercreek, Ohio.

i. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** forced entry into a FedEx delivery truck at the Greene Town Center, in Beavercreek, Ohio, and unlawfully removed from it an interstate shipment of Apple products - namely, over 300 Apple watches - with a value exceeding \$1,000.

j. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, **ALVARO OSWALDO LOAIZA-ALVAREZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** transported to

Centerville, Ohio, stolen Apple products illegally taken from an interstate shipment of goods in Beavercreek, Ohio, earlier that day.

k. On or about September 19, 2023, in Centerville, Ohio, **JONATHAN EDUARDO REMACHE-DIAZ** used his cellular telephone to photograph stolen Apple products illegally taken from an interstate shipment of goods in Beavercreek, Ohio, earlier that day.

l. On or about September 19, 2023, in Centerville, Ohio, **ALEXANDER WILSON DIAZ-REMACHE** used his cellular telephone to photograph stolen Apple products illegally taken from an interstate shipment of goods in Beavercreek, Ohio, earlier that day.

m. On or about September 19, 2023, in Centerville, Ohio, **ALVARO OSWALDO LOAIZA-ALVAREZ** unpackaged stolen Apple products illegally taken from an interstate shipment of goods in Beavercreek, Ohio, earlier that day.

n. On or about September 19, 2023, **ALEXANDER WILSON DIAZ-REMACHE** caused via FedEx the interstate shipment of stolen Apple products illegally taken from an interstate shipment of goods in Beavercreek, Ohio, earlier that day.

o. On or about September 22, 2023, **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, and GUSTAVO DANIEL**



**VINUEZA-BUENO** travelled to the Mall at Fairfield Commons, in Beavercreek, Ohio.

p. On or about September 22, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** began to follow and conduct surveillance of a UPS truck at the Mall at Fairfield Commons in Beavercreek, Ohio, with the intent to steal the interstate shipment within it.

q. On or about September 22, 2023, **ALEXANDER WILSON DIAZ-REMACHE**, **JONATHAN EDUARDO REMACHE-DIAZ**, and **GUSTAVO DANIEL VINUEZA-BUENO** communicated with one another via cellular telephone and Bluetooth technology while at the Mall at Fairfield Commons in Beavercreek, Ohio.

COUNT TWO

[18 U.S.C. §§ 659 ¶1 and 2]

On or about September 19, 2023, in the Southern District of Ohio, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ, and GUSTAVO DANIEL VINUEZA-BUENO**, aiding and abetting each other, with intent to convert to their own use, knowingly, intentionally, and unlawfully embezzled, stole, took, carried away, concealed, and by fraud and deception, obtained from any motortruck, trailer, and other vehicle, and from any intermodal container, trailer, and container freight station any goods and chattels of a value exceeding \$1,000 moving as and which were a part of and which constituted an interstate and foreign shipment of freight, express, and other property,

In violation of Title 18, United States Code, Sections 569 ¶1 and 2.

COUNT THREE

[18 U.S.C. §§ 659 ¶7 and 2]


On or about September 19, 2023, in the Southern District of Ohio, defendants **ALEXANDER WILSON DIAZ-REMACHE, JONATHAN EDUARDO REMACHE-DIAZ, ALVARO OSWALDO LOAIZA-ALVAREZ,** and **GUSTAVO DANIEL VINUEZA-BUENO**, aiding and abetting each other, knowingly carried and transported in interstate and foreign commerce goods and chattels of a value in excess of \$1,000 that had been embezzled and stolen, knowing the goods to have been embezzled and stolen.

In violation of Title 18, United States Code, Sections 569 ¶7 and 2.

A TRUE BILL

  
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foreperson

KENNETH L. PARKER  
United States Attorney

  
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BRENT G. TABACCHI  
Assistant United States Attorney